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and Defendants/Counterclaim Plaintiffs
27 United Healthcare Services, Inc., UnitedHealthcare
Insurance Company; OptumInsight, Inc.
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ALMONT AMBULATORY SURGERY
CENTER, LLC, a California limited
liability company, et al.,

Plaintiffs,

VS.

UNITEDHEALTH GROUP, INC.; et al.,
Defendants.

UNITED HEALTHCARE SERVICES,
INC.; et al.,

Counterclaim Plaintiffs

V.

**ALMONT AMBULATORY SURGERY
CENTER, LLC, a California limited
liability company; et al.,**

Counterclaim Defendants.

Case No. 2:14-CV-03053-MWF (VBKx)

**JOINT STIPULATION TO ENTRY
OF ELECTRONICALLY STORED
INFORMATION (ESI)
DISCOVERY PLAN**

Judge: Hon. Michael W. Fitzgerald

Magistrate Judge: Hon. Victor B. Kenton

Trial Date: None Set
Complaint Filed: March 21, 2014

The parties to the above-captioned litigation (the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, the Parties have entered into a stipulation regarding Electronically Stored Information (“ESI”);

WHEREAS, the Parties submit herewith a Proposed ESI Discovery Plan;

NOW, THEREFORE, the Parties agree that the Proposed ESI Discovery Plan be filed and entered in the above-captioned litigation.

IT IS SO STIPULATED.

1 Dated: November 20, 2014

WALRAVEN & WESTERFELD LLP

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By: /s/ Bryan S. Westerfeld
BRYAN S. WESTERFLED

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Attorneys for Defendant UnitedHealth Group, Inc., and Defendants/Counterclaim Plaintiffs United Healthcare Services, Inc., UnitedHealthcare Insurance Company, and OptumInsight, Inc.

Dated: November 20, 2014

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Dated: November 20, 2014

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ERIC M. CHAN

Attorneys for Plaintiffs and Counterclaim Defendants

Dated: November 20, 2014

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